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9 ENFORCEMENT, EDUCATION, SERVICES:  
10 HELPING YOU HELP OTHERS

11 UNITED STATES DISTRICT COURT  
12 NORTHERN DISTRICT OF CALIFORNIA

13 LES JANKEY, an individual; and ) CASE NO. C 08-02466 PJH  
14 DISABILITY RIGHTS, ENFORCEMENT, )  
15 EDUCATION, SERVICES:HELPING YOU )  
16 HELP OTHERS, a California public benefit )  
17 corporation, ) STIPULATION OF DISMISSAL AND  
18 Plaintiffs, ) [PROPOSED] ORDER THEREON  
19 v. )  
20 GEARY PARKWAY MOTEL; HENRY )  
21 KAO-CHUN YANG TRUSTEE of the )  
22 CHUNG LANG YANG IRREVOCABLE )  
23 TRUST; BALWANTSINH D. THAKOT, and )  
24 KIRANSHINH B. THAKOR, individuals dba )  
25 GEARY PARKWAY MOTEL, )  
26 Defendants. )  
27 \_\_\_\_\_ )  
28 )

29 The parties, by and through their respective counsel, stipulate to dismissal of this action in its  
30 entirety with prejudice pursuant to Fed.R.Civ.P.41(a)(1). Outside of the terms of the Settlement  
31 Agreement and General Release (“Agreement”) herein, each party is to bear its own costs and  
32 attorneys’ fees. The parties further consent to and request that the Court retain jurisdiction over  
33 enforcement of the Agreement. *See Kokonen v. Guardian Life Ins. Co.*, 511 U.S. 375 (1994)  
34 (empowering the district courts to retain jurisdiction over enforcement of settlement agreements).

1 Therefore, IT IS HEREBY STIPULATED by and between parties to this action through their  
2 designated counsel that the above-captioned action be and hereby is dismissed with prejudice  
3 pursuant to Federal Rules of Civil Procedure section 41(a)(1).

4 This stipulation may be executed in counterparts, all of which together shall constitute one  
5 original document.

6 Dated: May 17, 2011

THOMAS E. FRANKOVICH  
*A PROFESSIONAL LAW CORPORATION*

8 By: /S/ Thomas E. Frankovich  
9 Thomas E. Frankovich  
10 Attorney for Plaintiffs LES JANKEY and  
DISABILITY RIGHTS ENFORCEMENT,  
EDUCATION, SERVICES: HELPING YOU HELP  
11 OTHERS

13 Dated: May 17, 2011

Michael T. Heath  
Law Office of Michael Heath

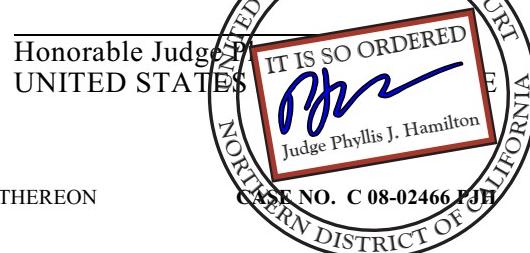
15 By: /S/ Michael T. Heath  
16 Michael T. Heath  
17 Attorneys for HENRY KAO-CHUN YANG  
TRUSTEE of the CHUNG LANG YANG  
18 IRREVOCABLE TRUST; BALWANTSINH D.  
THAKOT, and KIRANSHINH B. THAKOR

19 **ORDER**

20 IT IS HEREBY ORDERED that this matter is dismissed with prejudice pursuant to  
21 Fed.R.Civ.P.41(a)(1). IT IS FURTHER ORDERED that the Court shall retain jurisdiction for the  
22 purpose of enforcing the parties' Settlement Agreement and General Release should such  
23 enforcement be necessary.

25 Dated: May 23 \_\_\_\_\_, 2011

Honorable Judge P.J.H.  
UNITED STATES



26 STIPULATION OF DISMISSAL AND [PROPOSED] ORDER THEREON